

Hearing Date and Time: August 6, 2019 at 11:00 a.m. (Prevailing Eastern Time)

Objection Deadline: July 29, 2019 at 4:00 p.m. (Prevailing Eastern Time)

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Counsel for the ResCap Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <i>et al.</i> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
)	

NOTICE OF MOTION FOR ENTRY OF AN ORDER (I) MODIFYING THE COURT'S ORDER APPROVING PROCEDURES BY WHICH THIRD PARTIES MAY REQUEST AND OBTAIN STIPULATED RELIEF FROM THE AUTOMATIC STAY TO COMMENCE OR CONTINUE ACTIONS TO FORECLOSE ON SENIOR LIENS, (II) CLARIFYING THE SCOPE OF THE PLAN INJUNCTION PROVISIONS, (III) TO THE EXTENT NECESSARY, MODIFYING THE AUTOMATIC STAY AND PLAN INJUNCTION PROVISIONS TO PERMIT THIRD PARTIES TO COMMENCE AND COMPLETE ACTIONS TO FORECLOSE ON SENIOR LIENS AND NON-MONETARY CAUSES OF ACTION SEEKING TO CLEAR OR QUIET TITLE, AND (IV) MODIFYING THE COURT'S ORDER ESTABLISHING PROCEDURES TO ENFORCING INJUNCTIVE PROVISIONS OF THE PLAN AND CONFIRMATION ORDER

PLEASE TAKE NOTICE that on July 18, 2019, the ResCap Liquidating Trust filed the

Motion for Entry of an Order (I) Modifying the Court's Order Approving Procedures by Which Third Parties May Request and Obtain Stipulated Relief from the Automatic Stay to Commence or Continue Actions to Foreclose on Senior Liens, (II) Clarifying the Scope of the Plan Injunction Provisions, (III) To The Extent Necessary, Modifying the Automatic Stay and Plan Injunction Provisions to Permit Third Parties to Commence and Complete Actions to Foreclose

on Senior Liens and Non-Monetary Causes of Action Seeking to Clear or Quiet Title, and (IV) Modifying the Court's Order Establishing Procedures to Enforcing Provisions of the Plan and Confirmation Order (the "Motion"). A hearing on the Motion will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court located at One Bowling Green, New York, New York 10004, Courtroom 523 on **August 6, 2019 at 11:00 a.m. (prevailing Eastern time)**, or as soon thereafter as counsel can be heard.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court, together with a copy to the Chambers of Judge Glenn, and served so as to be received no later than **4:00 p.m. (prevailing Eastern time) on July 29, 2019** (the "Objection Deadline"), upon (i) co-counsel to the ResCap Liquidating Trust, Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019 (Attention: Norman S. Rosenbaum and James A. Newton); (ii) co-counsel to the ResCap Liquidating Trust, Kramer Levin Naftalis & Frankel, LLP, 1177 Avenue of the Americas, New York, NY 10036 (Attention: Kenneth H. Eckstein, Douglas H. Mannal, and Joseph A. Shifer); (iii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014 (Attention: Linda A. Riffkin); and (iv) The ResCap Liquidating Trust, 8400 Normandale Lake Blvd. Suite 920, Minneapolis, MN 55437 (Attention: Jill Horner).

PLEASE TAKE FURTHER NOTICE that if no objections or other responses are timely filed and served with respect to the Motion, the ResCap Liquidating Trust may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form

annexed as Exhibit 1 the Motion, which the Bankruptcy Court may enter without further notice or opportunity to be heard.

Dated: July 18, 2019
New York, New York

/s/ Norman S. Rosenbaum
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